IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS WACO DIVISION

WSOU INVESTMENTS, LLC D/B/A	§	
BRAZOS LICENSING AND	§	CIVIL ACTION 6:20-cv-00454-ADA
DEVELOPMENT,	§	CIVIL ACTION 6:20-cv-00455-ADA
Plaintiff,	§	CIVIL ACTION 6:20-cv-00456-ADA
	§	CIVIL ACTION 6:20-cv-00457-ADA
	§	CIVIL ACTION 6:20-cv-00458-ADA
	§	CIVIL ACTION 6:20-cv-00459-ADA
v.	§	CIVIL ACTION 6:20-cv-00460-ADA
	§	CIVIL ACTION 6:20-cv-00461-ADA
	§	CIVIL ACTION 6:20-cv-00462-ADA
	§	CIVIL ACTION 6:20-cv-00463-ADA
MICROSOFT CORPORATION,	§	CIVIL ACTION 6:20-cv-00464-ADA
Defendant.	§	CIVIL ACTION 6:20-cv-00465-ADA

JOINT CLAIM CONSTRUCTION STATEMENT

TO THE HONORABLE COURT:

Pursuant to the scheduling orders in these cases, the Parties jointly submit this claim construction statement.¹

A. -455, -457, -459, and -463 Cases

-455 Case, United States Patent No. 9,814,988 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
"adaptor unit" (Claim 20) [Proposed by Defendant]	Plain and ordinary meaning	a device, having a video receiver, hard disk, and CPU that encodes video data, that
		provides a game console with access to interactive services

¹ WSOU's Position: WSOU agrees with the Court's "default order" communicated to the parties on February 23, 2021 concerning the *Markman* hearings, namely the -454, -455, -457, -459, -461, -463, and -465 cases being heard on March 9, 2021 and the -456, -458, -460, -462, and -464 cases being heard on March 23, 3021. Microsoft's Position: The parties will discuss and offer a proposal to the Court as to which grouped terms should be discussed with the Court at the rescheduled March 9, 2021 *Markman* hearing and which should be discussed at the rescheduled March 23, 2021 hearing.

-457 Case, United States Patent No. 8,965,978 (Agreed)		
Claim Term/Phrase	Agreed Construction	
"gaining" (Claims 1 and 12)	gaming	
[Proposed by Plaintiff]		

-457 Case, United States Patent No. 8,965,978 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
"third-party lobby" (Claims 1 and 12) [Proposed by Defendant]	Plain and ordinary meaning	lobby separate from the local lobby associated with the gaming session
"lobby" (Claim 12) [Proposed by Defendant]	Plain and ordinary meaning	software and/or hardware that matches users to form groups

-459 Case, United States Patent No. 7,750,286 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
"polarization beam splitter	Plain and ordinary meaning	optical component with two
(PBS)" (Claim 15)		conjoined prisms, each of
		which reflects light of one
[Proposed by Defendant]		polarization and transmits
		light of an orthogonal
		polarization
"quarter-wave plate" (Claim	Plain and ordinary meaning	optical component that shifts
15)		a polarized light beam
		passing therethrough by one
[Proposed by Defendant]		quarter wavelength
"spatial light modulator	Plain and ordinary meaning	optical component with a 2-
(SLM)" (Claim 15)		dimensional arrangement of
		pixels that displays an image
[Proposed by Defendant]		

-463 Case, United States Patent No. 8,226,241 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
"spatial light modulator (SLM)" (Claim 15) [Proposed by Defendant]	Plain and ordinary meaning	optical component with a 2- dimensional arrangement of pixels that displays an image

B. -454, -465, and -461 Cases

-454 Case, United States Patent No. 7,366,160 (Disputed)		
Claim Term/Phrase Plaintiff's Construction Defendant's Construction		
"selecting two or more	Plain and ordinary meaning	selecting two or more
parameters of a network" and		different types of parameters

-454 Case, United States Patent No. 7,366,160 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
"measuring and/or calculating at two or more times values of the network parameters"		of a network / measuring and/or calculating at two or more times values of the two
[Proposed by Defendant]		or more different types of network parameters
"network parameter" [Proposed by Defendant]	Plain and ordinary meaning	measurable service level specifications from which service indicator values can be determined
"determining at two or more times the value of a service indicator", "determining a trend of the indicator", and "determining as a function of the trend of the indicator" [Proposed by Defendant]	Plain and ordinary meaning	computing [at two or more times the value of a service indicator / a trend of the indicator / a time of the service indicator crossing a defined threshold] using the [measured and/or calculated parameter values / determined indicator values / trend of the indicator]
"service indicator" [Proposed by Defendant]	Plain and ordinary meaning	an indicator of the quality of a network service distinct from the network parameters
"determining as a function of the trend of the indicator a time of the service indicator crossing a defined threshold" [Proposed by Defendant]	Plain and ordinary meaning	determining as a function of the trend of the service indicator the time remaining for the indicator crossing a defined threshold
"neural network determines rules of association between a service trend and service parameter values" [Proposed by Defendant]	Plain and ordinary meaning; not indefinite	Indefinite
"calculating a mathematical expectation of financial loss as a function of the network service trend determined" [Proposed by Defendant]	Plain and ordinary meaning; not indefinite	Indefinite
"determining a capacity to provide a network service at a given time"	Plain and ordinary meaning; not indefinite	Indefinite

-454 Case, United States Patent No. 7,366,160 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
[Proposed by Defendant]		

-465 Case, United States Patent No. 8,274,902 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
"network that branches, downstream of the collection point"	Plain and ordinary meaning	refers to a tree network
[Proposed by Defendant]		
"estimating a packet loss rate" and "an estimate of a packet loss rate"	Plain and ordinary meaning	calculating an approximate packet loss rate / a calculation of approximate packet loss rate
[Proposed by Defendant]		
"packet loss rate"	the fraction of packets that are lost over a suitable time	the fraction of packets that are lost over a suitable time-
[Proposed by Plaintiff]	interval	averaging interval
"wherein the collected data relate to packet losses on the portion of a GPRS core network extending from the collection point to a plurality of [base/mobile] stations"	Plain and ordinary meaning; not indefinite	Indefinite
[Proposed by Defendant]		

-461 Case, United States Patent No. 7,106,702 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
"active node(s)"	node(s) in an active state of	node(s) that carry out the
	AAA functionality	AAA functions for the
[Proposed by Plaintiff]		network by employing their
		respective user databases
"monitoring the active nodes	Plain and ordinary meaning	two active nodes monitoring
to determine if one of the		one another to detect if one
active nodes gets		becomes disconnected from
disconnected from the		the network
network", "said active nodes		
monitoring one another to		
detect if an active node		
becomes disconnected from		
the network", and		
"monitoring the active nodes		
to detect if one becomes		

-461 Case, United States Patent No. 7,106,702 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
disconnected from the		
network"		
FD 11 D C 1 1		
[Proposed by Defendant]	D1 ' 1 1' '	1 6 1 1
"each of said nodes having a user database"	Plain and ordinary meaning	each of said nodes
user database		maintaining its own user database
[Proposed by Defendant]		database
"activating the AAA	Plain and ordinary meaning;	Indefinite
functions of the active nodes"	not indefinite	maerimie
[Proposed by Defendant]		
"geographic distance	Plain and ordinary meaning;	Indefinite
therebetween is maximized",	not indefinite	
"geographic distance between		
active nodes is maximized",		
"geographic distance between		
it and the active node which		
got disconnected from the		
network is maximized", and		
"node selected in step (d) is chosen to maximize a sum of		
a geographic distance		
between the active nodes and		
a geographic distance		
between the node selected in		
step (d) and the node which		
got disconnected from the		
network"		
[Proposed by Defendant]		
"logging changes to the user	Plain and ordinary meaning;	Indefinite
databases for the active nodes	not indefinite	
thereby updating the same to		
reflect changes in information contained therein" and		
"wherein each of the active		
nodes logs changes to its user		
database thereby updating the		
same to reflect changes in		
information contained		
therein"		
[Proposed by Defendant]		

C. -460, -462, and -464 Cases

-460 Case, United States Patent No. 8,625,758 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
"accessing, dynamically, a rule for charging a sponsor of said communication services"	Plain and ordinary meaning	selecting in real-time which rule from a set of rules is applicable for charging a sponsor of said
[Proposed by Defendant]		communication service
"a plurality of parameter values including at least one respective value of at least one respective parameter other than an identity of an originator of the request for communication services, an intended recipient of a communication of the requested communication services and an identity of the sponsor" [Proposed by Defendant]	Plain and ordinary meaning	a plurality of parameter values, one of which must be something other than the location/country code of the phone number of an originator of the request for communication services, the location/ country code of the phone number of the intended recipient of a communication of the requested communication services, or the identity of the sponsor
"dynamically determining a rule for charging a sponsor of said communication service" [Proposed by Defendant]	Plain and ordinary meaning	selecting in real-time which rule from a set of rules is applicable for charging a sponsor of said communication service
"a plurality of parameter values including at least one respective value of at least one respective parameter other than an identity of an originator of a request for the communication service, an intended recipient of a communication of the requested communication service and an identity of the sponsor" [Proposed by Defendant]	Plain and ordinary meaning	a plurality of parameter values, one of which must be something other than the location/country code of the phone number of the recipient of an originator of the request for communication services, the location/ country code of the phone number of the intended recipient of a communication of the requested communication services, or the identity of the sponsor
"a first cost for the usage of said communication service is charged at least partially to said sponsor, by determining	Plain and ordinary meaning	Indefinite

-460 Case, United States Patent No. 8,625,758 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
a second cost, the second cost		
depending on said rule and		
said first cost"		
[Proposed by Defendant]		

-462 Case, United States Patent No. 7,106,727 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
"[determining / determine] a measure of the plurality of calls"	Plain and ordinary meaning	measuring the number and type of calls on the network
[Proposed by Defendant]		
"set of resources"	Plain and ordinary meaning	a part of a pool of physical network resources, each
[Proposed by Defendant]		capable of handling circuit- switched and packet-switched formats

-464 Case, United States Patent No. 7,706,519 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
"automatically"/ "automatic"	Plain and ordinary meaning	Indefinite
[Proposed by Defendant]		

D. -456 and -458 case

-456 Case, United States Patent No. 7,676,550 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
"presentity" / "presentities"	Plain and ordinary meaning	the entity whose presence is
		being represented
[Proposed by Defendant]		
"presence contributors"	Plain and ordinary meaning	an entity that provides
		presence information about a
[Proposed by Defendant]		presentity to a presence
		server or presence agent
"means for defining access	Plain and ordinary meaning,	Subject to 35 U.S.C. § 112 ¶
rules for each of said	not subject to 35 U.S.C. § 112	6.
presence contributors, said	¶ 6.	
access rules associated with		Function: defining access
each of said presence	But if the Court deems this	rules for each of said
contributors defining	term is subject to 35 U.S.C. §	presence contributors, said
respective rights and	112 ¶ 6:	access rules associated with
privileges of said presence		each of said presence

-456 Case, U	nited States Patent No. 7,676,55	50 (Disputed)
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
contributors to access said presence information of said presentity after said presence	Function: defining access rules for each of said presence contributors	contributors defining respective rights and privileges of said presence contributors to access said
contributors have provided said presence information to said presence server"	Structure: multiple access presence agent with presence server, and equivalents	presence information of said presentity after said presence contributors have provided
[Proposed by Defendant]	thereof Furthermore, if the Court	said presence information to said presence server.
	deems disclosure of an	Structure: presentity 110
	algorithm is required:	along with presence server 160 and presence agent 150
	Algorithm : define respective rights and privileges of	Algorithm that must be
	presence contributors to	included in the Structure:
	access the presence information of a presentity	Not Disclosed
	,	Term is Indefinite for failure to disclose structure including
		algorithm for performing the function
"means for authenticating one of said presence contributors to determine said access rules	Plain and ordinary meaning, not subject to 35 U.S.C. § 112 ¶ 6.	Subject to 35 U.S.C. § 112 ¶ 6.
associated with said one of	·	Function: authenticating one
said presence contributors"	But if the Court deems this	of said presence contributors
[Proposed by Defendant]	term is subject to 35 U.S.C.	to determine said access rules associated with said one of
[Proposed by Defendant]	§ 112 ¶ 6: Function : authenticating one of said presence contributors	said presence contributors
	to determine said access	Structure: presence server
	rules associated with said one of said presence	160 and presence agent 150
	contributors	Algorithm that must be included in the Structure:
	Structure: multiple access	Not Disclosed
	presence agent with presence	
	server, and equivalents thereof	Term is Indefinite for failure to disclose structure including algorithm for performing the
	Furthermore, if the Court	function
	deems disclosure of an	
	algorithm is required:	

-456 Case, United States Patent No. 7,676,550 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
	Algorithm: determine if said presence contributor is authenticated based on provided authentication credentials	
"means for enabling access to said presence information of said presentity by said one of said presence contributors based on said access rules associated with said one of said presence contributors" [Proposed by Defendant]	Plain and ordinary meaning, not subject to 35 U.S.C. § 112 ¶ 6. But if the Court deems this term is subject to 35 U.S.C. § 112 ¶ 6: Function: enabling access to said presence information of said presence contributors based on said access rules associated with said one of said presence contributors Structure: multiple access presence agent with presence server, and equivalents thereof Furthermore, if the Court deems disclosure of an algorithm is required: Algorithm: determine access rules for said one of said presence contributors and granting said one of said presence contributors the rights and privileges associated with said access rules	Subject to 35 U.S.C. § 112 ¶ 6. Function: enabling access to said presence information of said presence contributors based on said access rules associated with said one of said presence contributors Structure: presence server 160, presence agent 150, presence user agent 140, and communications network 130 Algorithm that must be included in the Structure: Not Disclosed Term is Indefinite for failure to disclose structure including algorithm for performing the function
"means for enabling access further includes means for filtering said presence information of said presentity based on said access rules of said one of said presence	Plain and ordinary meaning, not subject to 35 U.S.C. § 112 ¶ 6. But if the Court deems this term is subject to 35 U.S.C.	Subject to 35 U.S.C. § 112 ¶ 6. "means for enabling access further includes means for filtering said presence

-456 Case, United States Patent No. 7,676,550 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
contributors to produce	§ 112 \P 6, and to the extent	information of said presentity
filtered presence information	Defendant's proposal is	based on said access rules of
and means for providing said	understandable:	said one of said presence
filtered presence information	Function 1 of 2: filtering	contributors to produce
to said one of said presence	said presence information of	filtered presence information"
contributors"	said presentity based on said	
	access rules of said one of	Function 1: filtering said
[Proposed by Defendant]	said presence contributors to	presence information of said
	produce filtered presence	presentity based on said
	information	access rules of said one of
		said presence contributors to
	Structure 1 of 2: multiple	produce filtered presence
	access presence agent with	information
	presence server, and	
	equivalents thereof	Structure 1: presence server
		160 and presence agent 150
	Furthermore, if the Court	with access rules 210
	deems disclosure of an	
	algorithm is required:	Algorithm that must be
		included in the Structure 1:
	Algorithm 1 of 2: select	Not Disclosed
	some or all of said	
	presentity's presence	Term is Indefinite for failure
	information to allow said one	to disclose structure including
	of said presence contributor	algorithm for performing the
	to access or view	function
	Function 2 of 2: providing	"means for providing said
	said filtered presence	filtered presence information
	information to said one of	to said one of said presence
	said presence contributors	contributors"
	~	
	Structure 2 of 2: multiple	Function 2: providing said
	access presence agent with	filtered presence information
	presence server, and	to said one of said presence
	equivalents thereof	contributors
	Furthermore, if the Court	Structure 2: presence server
	deems disclosure of an	160, presence agent 150,
	algorithm is required:	presence user agent 140, and
	1	communications network 130
	Algorithm 2 of 2: allow said	or 135
	one of said presence	
	contributor to access or view	
	continuitor to access of view	

-456 Case, United States Patent No. 7,676,550 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
	the selected some or all of said presentity's presence information	Algorithm that must be included in the Structure 2: Not Disclosed
		Term is Indefinite for failure to disclose structure including algorithm for performing the function
"means for enabling access further includes means for enabling said one of said	Plain and ordinary meaning, not subject to 35 U.S.C. § 112 ¶ 6.	Subject to 35 U.S.C. § 112 ¶ 6.
presence contributors to update said presence information of said presentity based on said access rules of said one of said presence contributors" [Proposed by Defendant]	But if the Court deems this term is subject to 35 U.S.C. § 112 ¶ 6: Function: enabling said one of said presence contributors to update said presence information of said	Function: enabling said one of said presence contributors to update said presence information of said presentity based on said access rules of said one of said presence contributors
	presentity based on said access rules of said one of said presence contributors Structure: multiple access presence agent with presence server, and equivalents	Structure: presence contributors 120, presence server 160, presence agent 150 with access rules 210, presence user agent 140, and communications network 130
	thereof Furthermore, if the Court	Algorithm that must be included in the Structure: Not Disclosed
	deems disclosure of an algorithm is required:	Term is Indefinite for failure to disclose structure including
	Algorithm: providing one of said presence contributors the ability to set/change the presence information of said presentity subject to any limits on the ability according to said access rules	algorithm for performing the function
"means for enabling access further includes means for enabling said one of said	Plain and ordinary meaning, not subject to 35 U.S.C. § 112 ¶ 6.	Subject to 35 U.S.C. § 112 ¶ 6.
presence contributors to define preference information		Function : enabling said one of said presence contributors

-456 Case, United States Patent No. 7,676,550 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
associated with said presence information of said presentity based on said access rules of said one of said presence contributors" [Proposed by Defendant]	But if the Court deems this term is subject to 35 U.S.C. § 112 ¶ 6: Function: enabling said one of said presence contributors to define preference information associated with said presence information of said presentity based on said access rules of said one of said presence contributors Structure: multiple access presence agent with presence server, and equivalents thereof Furthermore, if the Court deems disclosure of an algorithm: providing one of said presence contributors the ability to set/change the preference information of said presentity subject to any limits on the ability according to said access rules	to define preference information associated with said presence information of said presentity based on said access rules of said one of said presence contributors Structure: presence server 160, presence agent 150 with access rules 210, presence user agent 140, and communications network 130 Algorithm that must be included in the Structure: Not Disclosed Term is Indefinite for failure to disclose structure including algorithm for performing the function
"means for authenticating further includes means for assigning authentication credentials to each of said presence contributors and means for receiving said authentication credentials of said one of said presence contributors to authenticate said one of said presence contributors" [Proposed by Defendant]	Plain and ordinary meaning, not subject to 35 U.S.C. § 112 ¶ 6. But if the Court deems this term is subject to 35 U.S.C. § 112 ¶ 6, and to the extent Defendant's proposal is understandable: Function 1 of 2: assigning authentication credentials to each of said presence contributors Structure 1 of 2: multiple access presence agent with presence server, and equivalents thereof	Subject to 35 U.S.C. § 112 ¶ 6. "means for assigning authentication credentials to each of said presence contributors" Function 1: assigning authentication credentials to each of said presence contributors Structure 1: presentity 110 and presence server 160 with presence agent 150

-456 Case, United States Patent No. 7,676,550 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
	Furthermore, if the Court deems disclosure of an algorithm is required:	Algorithm that must be included in the Structure 1: Not Disclosed
	Algorithm 1 of 2: associating authentication credentials with each of said presence contributors	Term is Indefinite for failure to disclose structure including algorithm for performing the function
	Function 2 of 2: receiving said authentication credentials of said one of said presence contributors to authenticate said one of said presence contributors	"means for receiving said authentication credentials of said one of said presence contributors to authenticate said one of said presence contributors"
	Structure 2 of 2: multiple access presence agent with presence server, and equivalents thereof	Function 2: receiving said authentication credentials of said one of said presence contributors to authenticate said one of said
	Furthermore, if the Court deems disclosure of an algorithm is required: Algorithm 2 of 2: not required under <i>In re Katz Interactive Call Processing Patent Litig.</i> , 639 F.3d 1303 (Fed. Cir. 2011)	Structure 2: presence contributors 120, presence server 160, presence agent 150, presence user agent 140, and communications network 130 or 135
		Algorithm that must be included in the Structure 2: Not Disclosed
		Term is Indefinite for failure to disclose structure including algorithm for performing the function
"means for enabling further includes means for enabling access to said presence	Plain and ordinary meaning, not subject to 35 U.S.C. § 112 ¶ 6.	Subject to 35 U.S.C. § 112 ¶ 6.
information of said presentity by multiple ones of said presence contributors		Function : enabling access to said presence information of said presentity by multiple

-456 Case, United States Patent No. 7,676,550 (Disputed)		
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction
simultaneously based on said	But if the Court deems this	ones of said presence
respective access rules	term is subject to 35 U.S.C.	contributors simultaneously
associated with said multiple	§ 112 ¶ 6:	based on said respective
ones of said presence	Function: enabling access to	access rules associated with
contributors"	said presence information of	said multiple ones of said
	said presentity by multiple	presence contributors
[Proposed by Defendant]	ones of said presence	a
	contributors simultaneously	Structure: presence server
	based on said respective	160, presence agent 150,
	access rules associated with	presence user agent 140, and
	said multiple ones of said	communications network 130
	presence contributors	Algorithm that must be
	Structure multiple access	Algorithm that must be included in the Structure:
	Structure : multiple access presence agent with presence	Not Disclosed
	server, and equivalents	Not Disclosed
	thereof	Term is Indefinite for failure
	thereof	to disclose structure including
	Furthermore, if the Court	algorithm for performing the
	deems disclosure of an	function
	algorithm is required:	
	Algorithm: provide access by	
	multiple ones of said	
	presence contributors	
	simultaneously to said	
	presence information of said	
	presentity, each of said	
	presence contributors	
	possibly having different	
	rights and privileges to said	
	presence information based	
	on said respective access	
	rules	

-458 Case, United States Patent No. 7,388,868 (Agreed)		
Claim Term/Phrase	Agreed Construction	
"emergency call muter" (Claim 12)	emergency call router	
[Proposed by Defendant]		

-458 Case, United States Patent No. 7,388,868			
Claim Term/Phrase	Plaintiff's Construction	Defendant's Construction	
"an emergency call router"	Plain and ordinary meaning	back-up call router that is operable only when the	
[Proposed by Defendant]		communication link fails	
"access gateway"	Plain and ordinary meaning	gateway coupled to the packet data network for	
[Proposed by Defendant]		communication with a softswitch	
"target gateway"	Plain and ordinary meaning	gateway coupled to the emergency call router and	
[Proposed by Defendant]		separate from the access gateway	
"selectably operable" and "selectably routing"	Plain and ordinary meaning	deciding whether to permit a call to be routed based on call-type or call priority	
[Proposed by Defendant]			
" wherein said emergency call muter is further for determining whether the call of the selected call-type shall be completable by way of the normal-operation communication link and for rerouting a call request to the local-network alternate station upon determination that the call completion by way of the normal-operation communication link"	Plain and ordinary meaning; not indefinite	Indefinite	
[Proposed by Defendant]			

DATED: February 25, 2021 Respectfully submitted,

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